

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

BERNADETTE HIGHTOWER, LATERSHIA
JONES, GEORGE DEAN, and BRUCE MARK
WOODRUFF, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

RECEIVABLES PERFORMANCE
MANAGEMENT, LLC,

Defendant.

Case No. 2:22-cv-01683-RSM

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
DISMISSAL/SETTLEMENT
PAPERWORK**

**NOTE ON MOTION CALENDAR:
June 10, 2024**

I. STIPULATION

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs Bernadette Hightower, Latershia Jones, George Dean, and Bruce Mark Woodruff, individually and on behalf of all others similar situated (“Plaintiffs”) and Defendant Receivables Performance Management, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time to file Dismissal/Settlement paperwork, and state as follows:

1 1. On April 24, 2024, the Parties notified the Court that a resolution has been
2 reached in this matter.

3 2. On April 24, 2024, the Court terminated all pending deadlines and ordered
4 Dismissal/Settlement paperwork to be filed by June 10, 2024. ECF No. 59.

5 3. The Parties continue to finalize the documents necessary to file their Motion for
6 Preliminary Approval, including several declarations that Plaintiffs intend to file in support of
7 their Motion.
8

9 4. The Parties agree and believe that an additional 30 days would assist the Parties in
10 finalizing the documents they need to present a full and helpful record to the Court.

11 5. In light of the above, the Parties stipulate and agree that good cause exists for an
12 extension as stipulated herein.

13 6. Considering the above and subject to Court approval, the Parties stipulate and ask
14 that the Court order that they shall have an extension of time up to and including July 10, 2024 to
15 file Settlement/Dismissal paperwork.
16

17 WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that
18 the Parties be granted an extension as stipulated and agreed herein.

19 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 10th day of June,
20 2024.

21 **TOUSLEY BRAIN STEPHENS PLLC**

**GORDON REES SCULLY
MANSUKHANI, LLP**

22
23
24 By: s/Kaleigh N. Boyd
25 Kaleigh N. Boyd, WSBA #52684
1200 Fifth Avenue, Suite 1700
Seattle, WA 98101-3147
26 Tel: (206) 682-5600

s/Sarah Turner
Sarah Turner, WSBA #37748
701 Fifth Avenue, Suite 2100
Seattle, Washington 98104
sturner@grsm.com

1 Fax: (206) 682-2992
2 kboyd@tousley.com

3 *Interim Liaison Counsel*

4 Bryan L. Bleichner, *pro hac vice*
5 Philip Krzeski, *pro hac vice*
6 **CHESTNUT CAMBRONNE PA**
7 100 Washington Avenue South, Suite 1700
8 Minneapolis, MN 55401
9 Phone: (612) 339-7300
10 Fax: (612) 336-2940
11 bbleichner@chestnutcambronne.com
12 pkrzeski@chestnutcambronne.com

Brian E. Middlebrook, *pro hac vice*
John T. Mills, *pro hac vice*
One Battery Park Plaza, 28th Floor
New York, New York 1004
bmiddlebrook@grsm.com
jtmills@grsm.com

Attorneys for Defendant

9 John A. Yanchunis, *pro hac vice*
10 Ryan D. Maxey, *pro hac vice*
11 **MORGAN & MORGAN COMPLEX**
12 **BUSINESS DIVISION**
13 201 N. Franklin Street,
14 7th Floor
15 Tampa, Florida 33602
16 (813) 223-5505
17 jyanchunis@ForThePeople.com
18 rmaxey@ForThePeople.com

19 *Interim Co-Lead Counsel*

ORDER

It is so ORDERED:

The Parties shall file Dismissal/Settlement paperwork on or before July 10, 2024.

DATED this 11th day of June, 2024.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE